UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

No. CR 14-00175 WHA

THIRD REQUEST FOR FURTHER RESPONSES RE DIXIE FIRE

Responses to the below shall be due **MONDAY, OCTOBER 25 AT NOON**.

23. Your October 18 response (Dkt. No. 1493) states (at page 3), "The outage log reflects that the recloser was opened at Cal FIRE's request at 20:00 on July 14." However, the data you submitted does not go up to 20:00 on July 14 (but stops at zero amps at 12:04). Please extend the chart to 20:00.

24. Switch 941 was turned off at 8:30 p.m. on July 13, according to Dkt. No. 1479 at p. 7. How, if at all, is this reflected in the data?

25. Did the railroad use all three phases or only two, and if only two, which two?

26. Before the fault (with slight variation), Phase A read 2.4 then 3.5, then 2.4, *etc.* What accounted for this pattern? Did the customer loads regularly vary in this manner? After the fault (with slight variation), Phase A read 1.2 then or 2.3, then 1.2, *etc.* What accounted for this pattern?

27. Before the fault (with slight variation), Phase B read 4.5, then 3.4, then 4.5, *etc*. What accounted for this pattern? Did the customer loads regularly vary in this manner? After the fault (with slight variation), Phase B read 2.3, then 1.2, then 2.3, *etc*. What accounted for this pattern?

28. Before the fault (with slight variation), Phase C read 1.2, then 2.3, then 1.2, *etc*. What accounted for this variation? After the fault, Phase C read 1.1 solid without variation, for many hours. What accounted for this circumstance?

29. Wouldn't the abrupt change from the back-and-forth pattern on Phase C to a steady 1.1 amps for many hours indicate a ground fault (*i.e.* power going to ground via a high-impedance object like a tree)? What else could explain the data?

30. When it is 6:48 a.m. PDT, it is 14:48 p.m. in London (UTC) (same day). The Madsen declaration is incorrect in how it used UTC. Please revise and use the correct data and be sure as to which phase was which.

31. Please update the answers to Question 4, at Dkt. No. 1474 pp. 10–11. Specifically, can PG&E determine whether, after the line-to-line fault on July 13, the railroad contacted PG&E to report a loss of power? Can PG&E supply detailed readings from the "non-communicating" SmartMeter 1010241169? If so, produce the readings from that meter from the four hours before and after the phase-to-phase fault.

32. At the hearing on September 13, the Troubleman testified that when he arrived at Pole 17733, he opened the still-closed fuse. He identified it as the fuse at the far right, as one looked at Photo Number 615 from July 18, 2021. Was this open fuse associated with Phase A, B, or C?

IT IS SO ORDERED.

Dated: October 19, 2021.

WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE